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January 24, 2024

VIA ECF

The Honorable Dale E. Ho
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 905
New York, NY 10007



Dale E. Ho
U.S. District Judge
Dated: January 25, 2024
New York, New York

Application **GRANTED**. The initial pretrial conference is **ADJOURNED to March 27, 2024, at 11:00 A.M. EST**. The parties shall join the conference by dialing (646) 453 - 4442 and entering the conference ID: 788 827 506, followed by the pound sign (#). The parties shall file the joint status letter and proposed case management plan by **March 20, 2024**. So Ordered.

Re: *Endurance American Insurance Company a/s/o Crystal Cove Seafood Corp. v. MSC Mediterranean Shipping Company S.A., et al.*
Case No.: 23-cv-08945 DEH

Dear Judge Ho:

We represent defendant MSC Mediterranean Shipping Company S.A. (“MSC”) and write jointly with plaintiff pursuant to the Court’s Individual Rules of Practice in Civil Cases, 2.e., to request the Court adjourn the upcoming initial conference. As the Court may be aware, two days ago, January 22, 2024, plaintiff filed a First Amended Complaint adding two new parties. Because we believe the initial conference would be far more productive with the participation of all parties, we respectfully suggest the conference be adjourned until after the new parties have been served.

Accordingly, MSC and plaintiff respectfully request the Court adjourn the initial pre-trial conference currently scheduled for Wednesday, January 31, 2024, until a date after March 15, 2024 convenient for the Court, by which time plaintiff anticipates having served the new defendants. Plaintiff and MSC are available on March 18, 19, and 21. This is the second request to adjourn the initial conference, though the first after plaintiff’s amended complaint, and as noted above, is made together with plaintiff.

We thank the Court for its attention to this matter.

Respectfully submitted,



Mark A. Beckman

cc: All Counsel of Record (via ECF)